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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 TAMILENE TANYA PEREZ,
15 Plaintiff,
16 v.
17 TIMOTHY TWYFORD; J.B. HUNT
18 TRANSPORT, INC.; DOES I-X,
19 inclusive, and ROE CORPORATIONS
I-X, inclusive,
20 Defendants.

21 CASE NO. 2:18-cv-00034-APG-VCF
22 **STIPULATION TO EXTEND
23 SCHEDULED DEADLINES
(FIRST REQUEST)**

24 (Assigned to the Hon. Andrew P. Gordon)

25 Pursuant to Local Rules IA 6.1 and 26-4, Plaintiff Tamilene Tanya Perez and
26 Defendants Timothy Twyford and J.B. Hunt Transport, Inc. (collectively the “Defendants,”)
27 and together with Plaintiff, the “Parties”) hereby stipulate and agree to extend the deadlines set
28 forth in the previously filed Joint Discovery Plan for a period sixty (60) days. This is the first
stipulation to extend any deadline in this proceeding.

29 **I. Discovery Completed to Date**

30 To date, the Parties each propounded written discovery upon one another. Defendants

1 served their responses to Plaintiff's written discovery on April 16, 2018. Plaintiff served her
2 responses to Defendants' written discovery May 15, 2018. A Rule 35 examination of the
3 Plaintiff was also conducted on May 23, 2018.

4 **II. Discovery Yet to be Completed**

5 Plaintiff's deposition is currently scheduled for June 26, 2018. Additionally, the Parties
6 are still working to coordinate and schedule the depositions of (1) a corporate designee of JB
7 Transport, Inc., (2) many of Plaintiff's medical providers, and (3) Plaintiff's lay witnesses. As
8 detailed below, the Parties have encountered numerous complications in scheduling the
9 depositions of the medical providers. The Parties agree that additional discovery is necessary
10 to clarify certain categories of damages claimed by Plaintiff. The Parties have also not
11 exchanged expert reports or conducted any expert discovery to date. The Parties also will
12 need to address any additional areas of discovery which become apparent through the course
13 of discovery and litigation in this matter.

14 **III. Necessity of Requested Extension of Time**

15 While the Parties have exchanged responses to written discovery, additional discovery
16 is necessary with respect to certain categories of damages claimed by Plaintiff. Such
17 discovery may necessitate the retention of additional expert witnesses in this case. The current
18 deadline for expert disclosures is July 9, 2018. Additionally, complications continue to exist
19 in securing dates to depose several of the Plaintiff's medical health care providers. The
20 current deadline to complete discovery is September 6, 2018. Due to these issues, the Parties
21 believe an extension as outlined below to all remaining deadlines is necessary. The Parties are
22 confident the requested extension will provide a sufficient amount of time for the Parties to
23 complete additional discovery as to the categories of damages claim by Plaintiff, identify all
24 necessary expert witnesses, and schedule and complete all necessary depositions in this matter.

25 **IV. Requested Modifications to the Scheduling Order**

26 The Parties stipulate and agree to modify the Joint Discovery Plain as follows:

27 1. **Discovery Cutoff Date:** November 6, 2018

28 2. **Expert Disclosures:** September 7, 2018

1 3. **Expert Rebuttal:** October 9, 2018
2 4. **Dispositive Motions:** December 10, 2018
3 5. **Joint Pretrial Order:** January 7, 2018
4 6. **Interim Status Report:** September 7, 2018

5 IT IS SO AGREED this 20th day of June, 2018.

6 DE CASTROVERDE LAW GROUP

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19 ORDER

20 IT IS SO ORDERED.

21 DATED: June 20, 2018



22 UNITED STATES MAGISTRATE JUDGE